

ELLIS LAWHORNE

John F. Beach
Direct dial: 803/343-1269
jbeach@ellislawhorne.com

February 26, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL SERVICE

Charles A. Scarminach, Esquire
Novit & Scarminach, P.A.
Post Office Drawer 14
Hilton Head, SC 29938


RE: Joint Application of Haig Point Utility Company, Inc. and CK Materials, LLC for Approval of the Sale, Transfer of Stock, Assets and Operating Authority of Haig Point Utility Company, Inc.
Docket No. 2007-414-W/S, ELS File No. 1030-11565

Dear Mr. Scarminach:

Enclosed for service on your client is Haig Point Club and Community Association, Inc.'s **First Requests for Production to CK Materials, LLC** in the above-referenced docket. By copy of this letter, I am serving this document upon all parties of record and enclose my certificate of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,



John F. Beach

JFB/cr

cc: The Honorable Charles L.A. Terreni (via electronic mail service)
Nanette S. Edwards, Esquire, (via first-class and electronic mail service)
Elaine H. Fowler, Esquire (via electronic mail service)
Mr. Mark Nordman (via 1st class mail service)
All parties of record

Enclosure

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2007-414-W/S**

IN RE:)	
)	
Joint Application of Haig Point, Inc.)	
and CK Materials, LLC for Approval of)	FIRST REQUESTS FOR PRODUCTION TO
the Sale, Transfer of Stock, Assets and)	CK MATERIALS, LLC
Operating Authority of Haig Point)	
Utility Company, Inc.)	

TO: Charles A. Scarminach, Esquire, Novit & Scarminach, P.A., Post Office Drawer 14, Hilton Head, SC 29938, counsel for CK Materials, LLC, and

Pursuant to S.C. Code Ann. Regs 103-833 (1976 and Supp. 2007), this party of record and intervenor, Haig Point Club and Community Association, Inc. ("HPCCA"), hereby serves these Requests for Production upon CK Materials, LLC in Docket No. 2007-414-W/S:

IT IS HEREIN REQUESTED:

- A. That all information requested below, unless otherwise specified, be limited to the Company's South Carolina operations.
- B. That all information shall be provided to the undersigned in the format requested.
- C. That all responses to the requests below be labeled using the same numbers as used herein.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the request for production response in the appropriate sequence.
- E. That any inquires or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format.
- G. That the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.

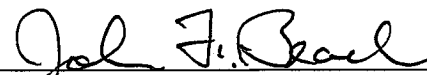
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer be indicated.
- I. That each of these Requests for Production be reproduced at the beginning of each of the responses.
- J. That the Company provide counsel for HPCCA one copy of the responses to these Requests for Production as soon as possible, but no later than March 10, 2008.
- K. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will be available.
- L. These Requests for Production shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- M. "Purchaser" shall mean CK Materials, LLC and Jadwiga "Jamie" Karabinachak.

REQUESTS FOR PRODUCTION

1. Please provide a current balance sheet or other document reflecting all assets and liabilities of CK Materials, LLC.
2. Please provide a current balance sheet or other document reflecting all assets and liabilities of CK Holdings, LLC. We are willing to receive these documents pursuant to an appropriate confidentiality agreement.
3. Please provide a current balance sheet or other document reflecting all assets and liabilities for Jadwiga "Jamie" Karabinachak. We are willing to receive these documents pursuant to an appropriate confidentiality agreement.

4. Please provide an income tax return for tax year 2006 for CK Materials, LLC.
We are willing to receive this document pursuant to an appropriate confidentiality agreement.
5. Please provide an income tax return for tax year 2006 for CK Holdings, LLC. We are willing to receive this document pursuant to an appropriate confidentiality agreement.
6. Please provide an income tax return for tax year 2006 for Jadwiga "Jamie" Karabinachak. We are willing to receive this document pursuant to an appropriate confidentiality agreement.
7. Please provide documents indicating the ownership and organizational structure of CK Materials, LLC, including any Operating Agreements.
8. Please provide documents indicating the ownership and organizational structure of CK Holdings, LLC, including any Operating Agreements.
9. Please provide any documents demonstrating the Purchaser's experience in owning and operating a water and/or sewer utility.

ELLIS, LAWHORNE & SIMS, P.A.

BY: 
John F. Beach, Esquire
1501 Main Street, 5th Floor
Post Office Box 2285
Columbia, SC 29202
(803) 779-343-1269
jbeach@ellislawhorne.com

February 25, 2008
Columbia, South Carolina

Attorney for Haig Point Club and
Community Association, Inc.

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2007-414-W/S**

IN RE:

Joint Application of Haig Point, Inc.
and CK Materials, LLC for Approval of
the Sale, Transfer of Stock, Assets and
Operating Authority of Haig Point
Utility Company, Inc.

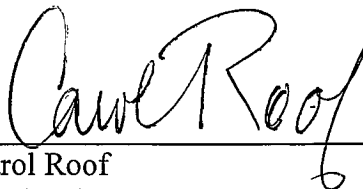
CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, one (1) copy of the **FIRST REQUESTS FOR PRODUCTION TO CK MATERIALS, LLC** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

Charles A. Scarminach, Esquire
Novit & Scarminach, P.A.
Post Office Drawer 14
Hilton Head, SC 29938
(counsel for CK Materials, LLC)

Laura J. Evans, Esquire,
Daniel S. McQueeney, Jr., Esquire
Pratt-Thomas Walker, P.A.
Post Office Box 22247
Charleston, SC 29413
(counsel for Haig Point Utility Company, Incorporated)

Nanette S. Edwards, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211
(counsel for ORS)



Carol Roof
Paralegal

February 26, 2008
Columbia, South Carolina